

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

In re:	)	
	)	
VANGUARD HEALTHCARE, LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 16-03296
Six Cadillac Dr., Suite 310	)	Chapter 11
Brentwood, TN 37027	)	Judge Mashburn
Debtors.	)	
	)	Jointly Administrated
		Hearing: March 28, 2017

**PRETRIAL ORDER REGARDING CONFIRMATION OF DEBTORS'  
AMENDED JOINT PLAN OF REORGANIZATION**

This is before the Court upon the Debtors' First Amended Plan of Reorganization dated February 14, 2017 (the "Amended Plan") (Docket No. 967). It appearing to the satisfaction of the Court upon the record in this case and the statements of counsel for the Debtors and the objecting parties at the preliminary hearing held on March 28, 2017, that objections and/or reservations of rights to the Amended Plan were filed by the following parties: Official Committee of Unsecured Creditors (Docket No. 1168), U.S. Trustee (Docket No. 1167), United States and State of Tennessee (Docket No. 1169), Healthcare Financial Solutions, LLC (Docket No. 1170), Medline Industries (Docket No. 1168), Kirk Hebert (Docket No. 1162), Consolidated Medical Staffing

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Vanguard Healthcare, LLC (9650); Vanguard Healthcare Services, LLC (7563); Vanguard Financial Services, LLC (3403); Aurora Australis, LLC (7099); Boulevard Terrace, LLC (8709); Elderscript Services, LLC (4179); Eldercare of Jackson County, LLC (7855); Glen Oaks, LLC (8238); Palace RBS, LLC (9601); Shady Lawn, LLC (7397); Vanguard of Ashland, LLC (8367); Vanguard of Church Hill, LLC (1049); Vanguard of Crestview, LLC (1046); Vanguard of Manchester, LLC (6203); Vanguard of Memphis, LLC (4623); Vanguard of Ripley, LLC (1050); Vicksburg Convalescent, LLC (7298); and Whitehall OpCo, LLC (6186).

(Docket No. 1164), CCP Mustang Holdings, LLC (Docket No. 1159), Signature Entities (Docket No. 1165), and Kindred Nursing Centers East, LLC (Docket No. 1166). It further appearing that it will be necessary to hold an evidentiary hearing on confirmation of the Amended Plan and that the parties are in agreement regarding the following pretrial procedure in preparation for that hearing, it is

ORDERED as follows:

1. The Court will hold a hearing on the confirmation of the Debtors' Amended Plan beginning on Wednesday, **June 14, 2017** commencing at 9:00 am, Courtroom One, 701 Broadway, Nashville, TN, and continuing on **June 15, 2017**, if necessary.
2. The parties will identify primary experts on or before **April 14, 2017** and expert reports will be due **May 5, 2017**. Reply expert reports will be due **May 25, 2017**. The Debtors and the Committee may hire experts as a cost of the litigation without having to seek prior Court approval of a professional under § 327. The cost and expenses of the experts may be included in the fees applications of Debtors' counsel.
3. Discovery will be completed on or before **June 2, 2017** and the period to respond to discovery under the Federal Rules of Civil Procedure is reduced to fifteen (15) days.
4. Final lists of witnesses and exhibits for use at trial and any stipulations will be due on **June 2, 2017** (Each party will submit its final list to the other parties by that date). In numbering exhibits, the following numbers should be used: Committee (1000); Healthcare Financial Solutions (2000); Debtors (3000); U.S. Trustee (4000); United States and the State of Tennessee (5000). Any others should contact Debtors' counsel to coordinate exhibit numbering.
5. Pretrial briefs should be filed on or before **June 7, 2017**.

**This Order Was Signed And Entered Electronically as Indicated At The Top Of The First Page.**

APPROVED FOR ENTRY:

/s/ William L. Norton III

William L. Norton III (TN # 10075)

James Bailey (pro hac vice)

BRADLEY

1600 Division Street, Suite 700

Nashville, Tennessee 37203

(615) 252-2397

bnorton@bradley.com

*Counsel for Debtors*

/s/ Paul G. Jennings

Paul G. Jennings (BPR # 014367)

Glenn B. Rose (BPR # 010598)

BASS BERRY & SIMS, PLC

150 Third Avenue South, Suite 2800

Nashville, Tennessee 37201

(615) 742-6273 (telephone)

(615) 742-6293 (facsimile)

Email: grose@bassberry.com

*Counsel to Official Committee of*

*Unsecured Creditors*

QUARLES & BRADY LLP

/s/ Robert P. Harris

John A. Harris (admitted *pro hac vice*)

Robert P. Harris (admitted *pro hac vice*)

Renaissance One

Two North Central Avenue

Phoenix, Arizona 85004-2391

Telephone: 602-229-5200

Facsimile: 602-229-5690

Email: john.harris@quarles.com

Email: robert.harris@quarles.com

-and-

ADAMS AND REES LLP

Charles W. Cook, III (No. 14274)

424 Church Street, Suite 2700

Nashville, Tennessee 37219

Telephone: 615-259-1450

Facsimile: 615-259-1470  
Email: charles.cook@arlaw.com  
*Attorneys for Healthcare Financial Solutions, LLC*

SAMUEL K. CROCKER  
UNITED STATES TRUSTEE, REGION 8

/s/ Megan Seliber  
MEGAN SELIBER  
Trial Attorney for the U.S. Trustee  
318 Customs House, 701 Broadway  
Nashville, TN 37203  
615-695-4060  
[megan.seliber@usdoj.gov](mailto:megan.seliber@usdoj.gov)

/s/ Garry K. Grooms  
Garry K. Grooms (TN # 12647)  
BURR & FORMAN LLP  
511 Union St., Suite 2300  
Nashville, TN 37219  
615-724-3229  
ggrooms@burr.com  
*Attorneys for PropCos*